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*Via E-Mail*

April 3, 2020

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**Re: Request to Pause Work Related to the Proposed Pebble Mine**

Assistant Secretary James and Lieutenant General Semonite:

I am writing to request that the U.S. Army Corps of Engineers (USACE) pause its work related to the proposed Pebble Mine during the COVID-19 crisis. During these difficult and uncertain times, it is imperative for my Tribe, the Nondalton Tribal Council, and other communities in Bristol Bay to focus our attention and resources on keeping our communities safe and healthy. The Alaska District has made clear that it intends to continue working on the environmental impact statement for the proposed Pebble Mine, despite multiple requests from local tribes and community organizations, and will not change its timeline in response to this crisis.

The preliminary final environmental impact statement (PFEIS) for the proposed Pebble Mine was provided to cooperating agencies, including my Tribe, on February 6, 2020, for a 45-day review period. On March 19, 2020, I wrote the attached letter to the Alaska District Engineer, Colonel Philip J. Borders, requesting a 90-day extension to the comment period. In that letter, I explained that additional time was necessary for my Tribe to adequately review and meaningfully comment on the extensive amount of highly technical and complex information contained in the PFEIS and supporting documentation. I also explained that the spread of COVID-19 had significantly disrupted our normal, daily life and created additional obstacles to developing comments on the PFEIS. Requirements for social distancing, self-isolation, and shelter-in-place orders, offices being

shut down or minimally staffed, and the challenges of teleworking significantly impeded my Tribe's ability to develop comments, even with the help of consultants.

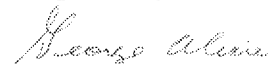
The day after my Tribe requested an extension, the Alaska District sent a "REMINDER" email to cooperating agencies reiterating the existing deadline for comments with no acknowledgement of our extension request or the difficult circumstances we were facing. Dismayed by this response, my Tribe continued to develop comments on the PFEIS, diverting critical time and attention from efforts to combat the spread of COVID-19. Only after the comment deadline passed, and my Tribe and many other cooperating agencies had submitted our comments, did the Alaska District provide a one-week extension to the comment period. This meaningless one-week extension provided inadequate time for cooperating agencies facing significant obstacles related to COVID-19. During a regularly scheduled cooperating agency teleconference on March 31, 2020—the day after the extended deadline for comments—the Department of the Interior and the Advisory Council on Historic Preservation stated that they had yet to submit comment on the PFEIS because of difficulties related to teleworking.

Just today, the Alaska District sent my Tribe a draft cultural resource management plan (CRMP), along with two other documents, being prepared as part of the USACE's National Historic Preservation Act Section 106 review. The Alaska District requested that we review these documents and set the deadline to comment on them for April 27, 2020, in just twenty-four days. This, despite the Advisory Council on Historic Preservation's recent guidance encouraging federal agencies to be more flexible with Section 106 deadlines. Again, the Alaska District is expecting my Tribe to divert critical resources and time away from protecting the health and welfare of our community to reviewing and commenting on the draft CRMP. The Alaska District is making us choose between protecting our cultural resources on one hand and protecting our community from COVID-19 on the other. This is unacceptable.

As the COVID-19 crisis intensifies, I am alarmed by the Alaska District's refusal to adjust its timeline in response to these extraordinary circumstances. Recently, Ravn Air, the biggest in-state airline in Alaska, suspended service to small, flight-dependent communities, citing revenue declines related to COVID-19. Stopping these flights severs a vital link between rural communities and urban centers. This is just one of the many challenges facing my Tribe and other Bristol Bay communities as we work to fight the spread of COVID-19.

I hope that you, your staff, and your families are well and safe. I respectfully request your assistance in helping to keep my Tribe and other Bristol Bay communities safe by urging the Alaska District to pause its work related to the proposed Pebble Mine. There is no need, no demand, and no necessity to move this process forward while our Nation addresses this crisis. The minerals at the Pebble deposit will still be there after COVID-19. Sadly, many of our fellow Americans will not. Please pause this process for the time being so that we may focus on the health and safety of our families, communities, and Nation.

Respectfully,



President George Alexie  
NONDALTON TRIBAL COUNCIL